

Mary L. Munger  
104 Lindeblad Lane  
Liberty Lake, WA 99019

November 27, 2006

Liberty Lake  
City Planning Commission

Re: Opposition to the Proposed Expansion of the Urban Growth Area

The proposed expansion is not about the needs of residents. It is not even about accommodating the current needs of the existing population in Spokane County, adjacent to the City of Liberty Lake. It is about expanding the City of Liberty Lake to encourage growth by developers. The question is at what cost?

I am opposed to:

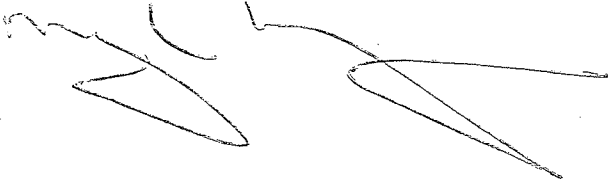
- Environmental changes that will destroy the ecology
- Quantitative changes that will destroy the quality of our surroundings
- Wasteful changes that will destroy the wetlands and waters
- Destructive changes that will jeopardize the natural wildlife
- Expansion that will further erode education

I embrace the City of Liberty Lake for the richness of experience that it offers its citizens: recreational opportunities are available to residents across social and economic strata because of the expanse of hiking, biking, and wilderness trails. Expand the UGA and you risk the very richness that brings value to our lives and to our property.

The population of Liberty Lake is expanding at a rate higher than 10%--as are our property values. This is not a conclave of elitists: it is a City built on the proposition that the quality of life is impacted by the quality of our surroundings. We do not have to jeopardize the quality of our lives by expansion that is contrary to this proposition.

I oppose the proposed expansion. I request that it be denied; and, if not denied, then that an additional study period be allowed to review the validity of the Environmental Impact Study as well as the forecasted population growth. Planning does not have to accommodate growth beyond that which the City services and quality of community resources can sustain. Our most valuable resource is our land—its waters, wildlife, forests, and granite-anchored hillsides. Do not give it up in the name of development that is being attracted by the very values that it will destroy. Curb and define the boundaries and intensity of development wisely and well—this land is our lasting legacy.

Mary L. Munger



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**Response to Mary Munger:**

- 1) Not a comment on the adequacy of the DEIS, but rather an expression of concern for various issues and a preference for a particular planning outcome.
- 2) The DEIS prepared by the City of Liberty Lake for the UGA Boundary Alternatives meets all requirements for state law and sufficiently addresses items for this Non-project Action. Further environmental review will be conducted if and when project applications are received.

December 6, 2006

1525 S. Lilac Lane  
Liberty Lake, WA 99019

DEIS Comments  
Planning & Community Development Dept.  
22710 E. Country Vista Dr.  
Liberty Lake, WA 99019

Received By  
City of Liberty Lake

DEC 06 2006

City Clerk/Treasurer  
Initials SP

Dear Mr. Smith:

I have several concerns regarding the Draft Environmental Impact Statement (DEIS) for the Urban Growth Boundary Alternatives. Thank you for considering my comments.

### General Comments

#### Inappropriate and Inflated Growth Projections

I disagree most with your assertions in section 3.4.1.2 starting on pg 3-36. This is a general comment because this whole DEIS and the push for development is predicated on your assertion that the City will be allocated 22,511 people by 2026 with an additional allocation of 15,586 from the County (table 3.7). I don't agree with this assertion. I have been told by reliable source in the County that this is not true. I also challenge the City to set its own destiny. There is no reason that the City of Liberty Lake needs to take such a huge population allocation. The City of Spokane projects a 35% increase in population, the City of the Spokane Valley projects a 39% increase. Airway Heights, similar in size to Liberty Lake, projects a 98% increase. Yet the City of Liberty Lake takes a 263% increase which requires a massive expansion of the Urban Growth Boundary into areas zoned Rural Tradition and Rural Conservation. This is outlandish. Why does Liberty Lake have to take the burden of population growth? I believe this is a false assertion and that the City of Liberty Lake should spend more time planning for the growth it has rather than promoting growth without adequate infrastructure. In addition, the entire need for this EIS disappears if one simply uses a more reasonable growth number.

#### Ignoring Comments from Citizens and Agencies

I am not convinced that you are doing anything with the comments you are soliciting from citizens. You asked for comments on the scoping of the EIS. I requested the following: "Please study the impacts of development on the lake. Development, if not properly managed, will destroy the lake, because water will not be allowed to flow into it and recharge the lake. This is a fragile watershed." I believe this is a fundamental, basic and common sense requirement of any DEIS that will impact a fragile lake. Yet your DEIS falls far short of adequately addressing the impacts to the lake.

You haven't even done enough research to determine the watershed boundaries for Liberty Lake (pg. 2.26). Apparently, it may be somewhere between 45% and 22% of the

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SW planning area. That is a huge range, which you simply copied from earlier documents. You don't know what the watershed boundary is for the lake.

On pg. 2.26 you state, "The health of the Liberty Lake Watershed depends on many factors. Potential threats to the watershed include stormwater runoff from roads and residential development. Additional threats include potential chemical use (e.g. fertilizers and pesticides) and nonnative vegetation." How can you possibly evaluate alternatives and their impacts when you haven't yet figured out the watershed for the lake? You are talking about massive development in an area zoned Rural Traditional and Rural Conservation. You need to at least establish basic information in order to determine the impacts. I am deeply disappointed that you did not bother to adequately study the impacts on the Liberty Lake watershed.

In addition, you are asking for comments on the DEIS, yet you are going to issue the final EIS a mere 3 business days from the deadline for receiving comments. I do not believe that you can adequately address the comments from citizens and agencies in 3 working days. It would take more than 3 working days to address my comments alone. Given the timelines you have established, I can't see how you will do anything but ignore the comments you receive.

#### **Inadequate Analysis**

I do not believe the DEIS adequately addresses the impacts of changing the UGA. For the bulk of the document you have merely described general conditions with little or no analysis of the impacts of changing the UGA boundary. You have, for each scoping area of the DEIS, described the UGA existing conditions to varying degrees. Then you describe general impacts of development on the study area. Then you simply restate, in various forms, the following:

Alternative 1 has the least impact

Alternative 2 has the most impact

Alternative 3 has an impact North of the City

Alternatives 4-7 have less of an impact than Alternative 2.

For example, for 3.5.2 Plants and Animals - Impacts

#### Alternative 1 – No Action

The No Action alternative is expected to push growth and the impacts of growth not previously anticipated during the 2001 projections to the existing City limits. This alternative would focus development and impacts in the existing City and would be expected to result in the least amount of land impacted by development.

#### Alternative 2 (All Alternatives Included) – Adjusted UGA Boundary

This would expand development outside the existing UGA and would be expected to have the most significant and widespread impacts to plants and animals.

#### Alternative 3 – NW Proposal

This alternative would concentrate urban development into compact areas and would be expected to have less significant impacts to plants and animals than alternatives 2, 4, 5, 6, and 7.

#### Alternative 4 – Entire SW Proposal

This alternative would be expected to have similar effects as alternative 2, but would create slightly less impact to plants and animals.

Alternative 5 – SW excluding areas east of Garry Rd. and west of Henry Rd.

This alternative would be expected to have similar effects as alternative 4, but would create significantly less impact to wetland and waterfowl priority habitats than alternative 4.

Alternative 6 – SW excluding east of Garry Rd.

This alternative would be expected to have similar effects as alternative 4, but would create less impact to plants and animals.

Alternative 7 – SW area excluding west of Henry Rd.

This alternative would be expected to have similar effects as alternative 4, but would create significantly less impact to wetland and waterfowl priority habitats than alternative 4.

This is all fairly evident. I was hoping that you would have done more analysis and less restating of the obvious. If your response to this concern is that this is a non-project, programmatic EIS, then I ask you why you went through the effort. If you had no intentions of actually analyzing the impacts development on these areas; if you were simply going to describe what is there and describe general impacts that might apply to *any* areas; if you were going to limit your mitigation to a generic list of mitigation that could apply to *any* project, but wouldn't necessarily apply to these projects; then you shouldn't have taken the time to go through this process. You should have done a more thorough job to fully understand the impacts of what you are proposing.

**Inappropriate Rezoning**

A large section of the expansion area is zoned Rural Conservation (RCV). This "zone applies to environmentally sensitive areas, including critical areas and wildlife corridors. Criteria to designate boundaries for this classification were developed from Spokane County's Critical Areas ordinance and Comprehensive Plan studies and analysis. This classification encourages low-impact uses and utilizes rural clustering to protect sensitive areas and preserve open space."

How can you take this type of land with this definition and suggest that it be turned into high density urban growth areas? You are proposing rezoning land that is classified as environmentally sensitive in order to promote growth that you claim is coming in twenty years. There is plenty of room for growth right now. There is plenty of room for the kind of growth that every other City in the County is contemplating. Rather than destroying these environmentally sensitive areas, the City should plan for a more realistic growth number and incorporate growth into the existing, appropriately zoned areas that already exist.

In fact, on page 3-48 you state that an impact of not expanding the UGA into these sensitive areas is that "A residential requirement would likely be required in the City's mixed use zones." So instead of a residential requirement in the City's Mixed Use zones, you are proposing a residential requirement in Rural Conservation zones. The logic of this is completely beyond me. The reason we have zoning and the reason we have Urban

Growth Areas is so that we can preserve rural conservation zones and develop housing in other areas – like Mixed Use zones.

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#### Conflict of Interest

This proposal is all about rezoning land. It is about taking land that is currently zoned Rural Conservation and Rural Traditional and rezoning it so that developers can make more money by building more houses. The document claims that this is necessary because of the impending growth in the area. This growth projection has been put forth by Doug Smith, the Director of Planning and Community Development. It is a highly contested assertion and County officials, State agencies, Local agencies and local citizens have all disputed his numbers. The growth number is the only thing requiring this change in zoning. However, Doug Smith is a landowner in the area and will benefit substantially from a change in zoning. This is a clear conflict of interest. The lead SEPA responsible official, who owns property in the study area, is trying to get the zoning changed from rural traditional to high density development. There is clearly a conflict of interests.

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#### Inadequate Mitigation Measures

The mitigation measures listed are just ideas. Where are the plans to implement them? Where is the analysis of which mitigation measures would be best suited to the specific conditions at Liberty Lake? I do not think you have done an adequate job analyzing the impacts and the appropriate mitigation.

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### Specific Comments and Questions

#### Preamble

Why leave out required environmental review (SEPA checklist) if you know the only reason for expanding the UGA is to develop houses? If you know you're going to develop houses you should be evaluating the specific impacts of residential development.

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#### Preamble

"The loss of undeveloped land is unavoidable regardless of whether the Urban Growth Area is expanded or not." This is a false and misleading statement. Changing zoning from Rural Traditional and Rural Conservation to higher density residential and mixed use will have a much greater impact on undeveloped land than leaving the current zoning. Expanding the Urban Growth Area will promote high density development in previously undeveloped areas.

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#### Preamble

"The purpose of a UGA is to contain development in specific areas so as to mitigate as much as possible the impacts of population increases." I agree with this statement. However, if you keep changing the UGA to promote development then it has no meaning. You are completely disregarding the UGA by moving it into areas that are zoned Rural Traditional and Rural Conservation. You are not containing development. There already is an Urban Growth Area - you are ignoring it.

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Pg. 5

"The no action alternative could create a shortage of land for urban residential development resulting in increased housing costs and push development to rural areas of the county which will continue the present trend of private automobile dependence and increase traffic congestion on City and county arterials." I see no evidence in the document that the no action alternative will create more of a dependence on automobiles. I also think that congestion has more to do with the number of people that live in an area and the transportation infrastructure. I don't agree with you that Alternative 1 will increase traffic congestion on City and County arterials. All of your alternatives will increase traffic.

Pg 1-1

I don't agree with the assertion that the 20 year projected population of 22,511 is accurate. Neither does anyone else I have spoken with.

Pg. 1-1 – 1-7 Section 1

The choice of the study area is particularly troubling to me. You have an area to the north of the City and then Alternatives 2, 4, 5, 6, and 7 are all variations in the same area. You did not examine anything to the northeast, the west or the east of the City. Why did you not explore going further east along Interstate 90? I was told by the Director of Planning and Community Development it was because these areas are zoned rural traditional. So is most of the area you are looking at. You're proposing a massive change in zoning in most of your alternatives so this can't be the reason. I would like to know why these other areas were not considered.

Pg. 1-8 Section 1.3.1

The Washington State GMA includes the following goals for GMAs:

"Discourage the conversion of undeveloped land into sprawling, low density, development", "Conserve Critical areas of the environment", "Provide open space and recreational opportunities", and "Provide adequate public facilities and services to serve new growth".

I don't believe your plan for expansion into rural areas serves any of these. I am most troubled by the lack of facilities to support all this growth you are promoting. You are turning a nice rural area into a sprawling development with strip malls, traffic, few recreational areas, few natural areas and inadequate basic infrastructure like schools.

Pg. 1-11 Section 1.5

You state the following: as a project objective: "Provide certainty to residents, property owners, developers and the community regarding the nature and extent of future development in Liberty Lake and in the City's UGA."

Rezoning land does not provide certainty. I am worried now that my neighborhood may be rezoned. How can one plan for future development if the City keeps turning rural land into developed land? Will you next turn residential land in industrial land? I don't want to

live next to a factory or a tavern, but your disregard for zoning and Urban Growth Boundaries has now created massive uncertainty for all the citizens of Liberty Lake.

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**Pg. 1-11 Section 1.6**

"It should be noted that under each of the seven alternatives, projected population growth remains constant and is based on an adopted population projection of 22,511 residents for the City of Liberty Lake by the year 2026." As stated earlier. This is a false assertion and it is the cornerstone of this whole effort. Take away this assumption and the City can get down to the business of providing infrastructure and facilities for the citizens it has, rather than promoting growth it can't support.

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**Pg. 1-12**

"Adding lands to the existing Urban Growth Areas must be supported with a full array of urban services and be developed to ensure efficient use of services. Specific mitigation measures would be determined at the time a development proposal is made and could affect the ability for growth to occur in some areas."

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This is not happening right now. Road congestion and overcrowded schools are a problem right now. This will only get worse with growth that outstrips a City's ability to provide adequate infrastructure.

**Pg. 2-4 Map 2.3**

I can't believe you are considering putting high density residential development in a flood plain. This map shows part of the UGA in a FEMA flood plain. Why would you propose this? I don't even know how to comment on this except to say that it is ludicrous.

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**Pg. 2-5**

Alternatives 2,4,5,6, and 7 all include major erosion impacts. This will impact the lake. I am against alternatives that will adversely impact Liberty Lake. I don't think the City should be promoting growth in areas that will cause soil erosion that will contaminate the Lake.

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**Pg. 2-6.**

You say the "The health of the Liberty Lake Watershed depends on many factors. Potential threats to the watershed include stormwater runoff from roads and residential development. Additional threats include potential chemical use (e.g. fertilizers and pesticides) and nonnative vegetation." In addition many citizens have expressed concern over the impacts to the watershed. Despite all this, you haven't even done enough analysis to figure out the watershed boundaries for the lake. How can you possibly evaluate alternatives and impacts if you don't know the watershed boundaries?

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**Pg. 2-7**

"The Spokane County Board of Commissioners recently passed a resolution regarding adoption of screening and evaluation criteria for the Spokane County Comprehensive Plan Update which states that land currently zoned Rural Conservation should be

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excluded from inclusion in the UGA.” If this is the case, why are these areas included in some alternatives? Why are you including areas that are zoned Rural Conservation areas? Why are you ignoring the Spokane County Board of Commissioners?

Pg.-2.7

“Altered drainage from land disturbance activity, unless intentionally corrective, may result in a destabilized drainage network. Accelerated runoff or diversion of drainage from one system to another, may result in the temporary or prolonged overburdening of channel carrying capacity, causing scouring of stream banks, possible flooding and downstream sediment deposition. Altered drainage may also wash away topsoil, preventing the reestablishment of vegetation, thus continuing the erosional cycle.”

This strikes me as an honest assessment of potential problems and I don’t believe the area has been sufficiently studied to determine the severity of the impacts. Even before getting to the specifics of a particular development project, this DEIS should have included more detailed evaluation of these types of impacts on the fragile lake and river systems in the proposed UGA expansion areas.

#### Pg 2-11 – 2-13 Section 2.1.3 Earth Mitigating Measures

As with all the mitigation measures, these are just a list of ideas that could have come from any previous document or text book and that could apply to almost any situation. Apart from some of them sounding very bureaucratic, the study should have more explicitly described which of these will be implemented? Where is the analysis of which ones are needed?

For example, 2.1.3.7 describes zones that “promote the conservation of public and private sensitive or critical natural resource areas and areas of local interest as open spaces.” That is fine, but there is no commitment to what areas will be protected in the various alternatives. There are plenty of sensitive areas ranging from flood plains to riparian areas to watershed, but there is no analysis, description or commitment to protect these areas from harm. There are just lists of generic policies and tools and existing regulations that may or may not be applied. There is simply not enough analysis or information for these sections to be meaningful.

#### Pg 2-17 section 2.3.1.3 Local Industries

Larger industries in this region can have an impact on air quality. According to SCAPCA, there are 11 registered facilities in the City of Liberty Lake which range from manufacturing, paint booths, gas stations, and sewer treatment facilities. Pollutants may be in the form of stack discharges or odors from indirect sources. Currently the Department of Ecology and SCPACA regulate all other air pollution sources. There are a variety of small to medium sources of air pollution located throughout the greater Liberty Lake area. Some emit odorous compounds as well as criteria air pollutants.

This is hardly enough information, with no analysis, to make an informed decision or comment. What is the air pollution, what are the pollutants? What are you going to add to

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the mix? There is no analysis of how the potential development will impact the air pollution.

**Pg 2-19 section 2.3.2**

This section is completely inadequate. There is no analysis of the air quality impacts or traffic impacts. This could apply to any alternative in any City. The mitigating measures are just a list of measures. There is no analysis or commitment to any action.

**Pg. 2-27 Water Quality**

"The Saltese Flats are one of the few remaining large wetlands in the Spokane area still somewhat intact. Potential threats to this watershed include urban runoff, septic tank leakage and fertilizer/pesticide runoff urban, and increased urban development."

There is not nearly enough information or analysis on the Saltese Flats. This area should not be considered for the kind of intensive development you have in mind with an expanded Urban Growth Area. This is so obvious that the County even recommended that you remove this fragile area from the study area, or at least perform a 'very robust environmental analysis'. You haven't done that.

I don't think any alternative should be considered that impacts these wetlands. In fact, I'm not sure how you allow someone to develop in these wetlands given current law. Furthermore, why are you considering urban development in such a sensitive area, when you already have plenty of land for any immediate growth needs, you don't need to grow at the astronomical rates you have established for this study, and the impact you are avoiding is urban development in existing mixed use zoning. It is much better to impact mixed use zoning than fragile wetlands in Rural Conservation zones.

**Pg. 2-28 section 2.4.2 Water Resources - Impacts**

You state as an impact of Alternative 1 – No Action, "Increased development outside of cities and UGAs, where inadequate stormwater management facilities exist is likely to increase impacts to surface water, groundwater, and wetlands."

Why is this statement in the Alternative 1 proposal? It should be in all the others. There are no stormwater management facilities in the areas proposed. The impacts will come from expanding high density development into areas currently zoned Rural Conservation and Rural Traditional, not from the No Action alternative which would promote development in areas currently zoned for high density residential. This impact should be for Alternatives 2-7, not Alternative 1.

Also, there is no analysis here. The stated impacts are generic, one sentence descriptions based on the size of the areas. The DEIS should have included more specific analysis of how changing the Urban Growth Boundary would impact the water resources in this very unique area with a lake, a river and a large wetland.

**Pg. 2-32 Map 2.9**

This map is simply not accurate.

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One need only go outside, on ANY morning to find deer and other animals in areas that are left blank on this map. I do not know what your information source is for this map. Although the DEIS contains a bibliography, nothing is footnoted. Nonetheless, there is evidence of wildlife in areas left blank on the map if one bothers to look.

I also find it hard to believe that white tailed deer stay out of the UGA proposed expansion area. You show them occupying an area that stops in a direct line at the UGA expansion boundary. This is an insult to my intelligence and a gross overestimation of deer intelligence. Deer are not smart enough to stop their movement along a straight line at a UGA boundary. There are deer and other animals in the proposed expansion area.

You have also left off any mention of impacts on cougar, bear and other higher order carnivores. These animals live in and around the study area and will be impacted. They will also be driven to other areas as you replace their habitat with high density development. This is an impact that is important to both the animals and to the people. When citizens start seeing cougars in their backyards because their habitat has been destroyed, the City will have a big problem on its hands. These impacts should have been addressed in the DEIS.

**Pg. 2-33 – 2-35 Section 2.5.1.1**

This is a good example of information copied from a textbook or other document with little or no analysis of how it relates to the DEIS for this specific area. For example, in section 2.5.1.1.3 you describe Disturbed Land. Where is this disturbed land? There is no map showing it. There is no description of specific disturbed land in the study area and how it will be impacted.

**Pg. 2-35 Section 2.5.1.2.1**

What research did you do to determine there were no Endangered species? Based on Map 2.9, which is not accurate, I have little confidence that you have adequately investigated the presence and impacts on Endangered species. Bald Eagles are common to this area and I don't believe they are as adept as the deer at staying out of the proposed expansion area. Simply look outside and you will see bald eagles. These impacts should have been included in the study.

**Pg. 2-35 Section 2.5.1.2.2**

What research did you do to determine there were no Threatened species? Based on Map 2.9, which is not accurate, I have little confidence that you have adequately investigated the presence and impacts on Threatened species.

**Pg. 2-35 Section 2.5.1.2.3**

What research did you do to determine there were no Priority and Sensitive species? Based on Map 2.9, which is not accurate, I have little confidence that you have adequately investigated the presence and impacts on Priority and Sensitive species.

**Pg. 3-16 - 3-17 Section 3.3.1.8 Public Schools – Impacts**

This DEIS is about changing zoning to promote growth. You are promoting this growth right now, today. Yet right now, today, our schools are overcrowded. The Central Valley School District has officially stated that they will be out space. Bond issues for more schools have not passed. Most importantly, my two, young, elementary aged children can not even go to the same school because of overcrowding. Splitting up communities by making children in the same community go to different schools is the first blow to a school district. The death knell is your suggestion below.

"School Districts could examine possible ways to maximize use of existing school facilities, such as split shift school days where some students attend morning classes and some students attend afternoon/evening classes."

This will destroy our schools and our community. How can you plow forward and promote even more growth in the face of this looming disaster. If our schools are terrible – our community will be terrible.

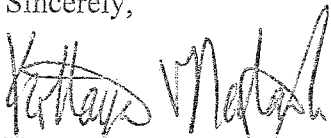
There is no analysis and you have simply stated general solutions that could apply to any City. You have more words describing the impact on housing prices (which does not belong in the section on schools) than you do describing the impact on schools. Your solutions are all generic and rely on the School District solving the problem – which you are creating. You could better address this problem by working with the School District and not promoting growth that outstrips the City's and the community's infrastructure.

### Conclusion

I am very disappointed with the superfluous level of analysis of this DEIS. I am also troubled by the incredibly fast pace the City is taking to push this through. You are not adequately incorporating comments from citizens or other public agencies.

Most importantly, you are not doing what is best for the City. My children cannot go to the same school because of overcrowding, yet you are promoting massive growth in this area. Please spend less time promoting growth and more time planning for the growth you have. Put in transportation infrastructure, schools, parks, recreational areas, adequate utilities. Do the things a City should to take care of its citizens. Do these first, then worry about expanding and promoting growth. If you do these backwards you will destroy the quality of life we have all come to cherish. The only winners will be developers who have succeeded in getting land rezoned so they can make more money by building more houses.

Sincerely,



Kottayam V. Natarajan Jr.

and



Alison Ashlock

Members of the Liberty Lake Community since 1966

Response to Kottayam V. Natarajan Jr. & Alison Ashlock:

- 1) The Growth Management Act (GMA) requires that Counties and Cities adopt population projections within a range provided by the Washington State Office of Financial Management (OFM). The County and City must then plan for and adopt Comprehensive Plans to accommodate the projected population over the next 20 years. Population forecasts will be updated when the Plan is updated at required intervals.

The State Office of Financial Management, Spokane Regional Transportation Council, Spokane County, and the City of Liberty Lake conducted independent population-forecasting studies. As a result of these studies, Liberty Lake requested a population allocation in the midrange of the projected growth for Liberty Lake (from a total of 197,939 projected population growth for all of Spokane County). The future population estimates represent an increase of 15,586 additional people living in Liberty Lake in the next 20 years, for a total population of about 22,511.

The UGA Study Area represents an area large enough to accommodate the projected growth for 20 years and provides a boundary in which to study the off site impacts. The final UGA will take into consideration land quantity analysis, environment constraints, ability to provide services, and the citizen's vision for the city.

Because of geographic location, natural beauty, and abundant amenities, the City of Liberty Lake continues to be a desirable place to locate. Growth in Liberty Lake has historically exceeded 11% of Spokane County's total growth. By acknowledging this we are addressing our responsibility to plan in advance for the growth that is certain to occur in the future. By being realistic about the anticipated growth we meet our statutory requirement of the Growth Management Act, but more importantly, by planning now we have better certainty of sustaining the quality of life we now appreciate.

- 2) The DEIS does not attempt to, nor is it required to, put forward every possible impact or mitigation measure, nor does it guarantee that the mitigation measures that are presented will be implemented. Detailed analysis of impacts and implementation of mitigation measures will take place upon application of specific projects so appropriate actions can be taken at that time.

The DEIS broadly examines the impacts of a range of strategies for accommodating projected growth. WAC 197-11-442 states that non-project DEISs "shall be limited to a general discussion of impacts...and implementation measures. The lead agency is not required under SEPA to examine all conceivable policies, designations, or implementation measures but should cover a range of such topics".

This is a Non-project DEIS, and the concerns of the writer cannot be addressed until and if specific project applications are received. Further environmental review will occur at that time.

- 3) The DEIS does not advocate for any alternative or combination of alternatives examined.

By reducing the industrial and commercial land supply to provide for residential development, the City would become a bedroom community that would not be self-sustainable.

- 4) See response to 1 above regarding population and:

There is no clear conflict of interest brought about by the fact that the SEPA responsible official owns land in some of the proposed alternatives. If land ownership is the sole factor in constituting a conflict of interest, then every

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comment received from a landowner in any of the UGA alternatives would have to be dismissed for the same reason. The comment writer presumes to know what Mr. Smith's plans for his property are. In addition, Mr. Smith's land is zoned rural conservation, and as with all lands zoned rural conservation, has never been eligible for inclusion in the UGA.

- 5) SEPA checklists are not required on "public proposals on which the lead agency has decided to prepare its own EIS" (WAC 197-11-315).
- 6) This is not a false and misleading statement; this is an accurate and fair statement based upon the reality that homes will continue to be built in these areas regardless of zoning, and the DEIS does not advocate for any alternative or combination of alternatives examined.
- 7) Not a comment on the adequacy of the DEIS, but rather an expression of concern for population allocation issues and a preference for a particular planning outcome.
- 8) This is an accurate and fair statement based upon the reality that homes will continue to be built in these rural areas possibly without the necessary road improvements and public transit opportunities.
- 9) The ability to provide infrastructure is limited east of City limits due to topography, and the existing development pattern of 10-acre home sites to the east and northeast make infill difficult and comprehensive planning problematic. Some areas west of the city are considered, but much of the area west of the City is already annexed in to the City of Spokane Valley. Currently, the majority of the proposed UGA Study Area contains vacant, undeveloped land.
- 10) The Growth Management Act (GMA) requires that Counties and Cities adopt population projections within a range provided by the Washington State Office of Financial Management (OFM).

Public facilities such as roads, sewer, and water do not need to be present for the UGA to be expanded; the facilities will need to be provided prior to development within the UGA.

- 11) The City consulted with Spokane County and Liberty Lake Sewer and Water District and was provided with two different, viable, delineations for the Liberty Lake watershed. In the interest of providing as much information as possible to decision makers and the public, we included both in an effort to be as complete as possible. It is neither necessary nor recommended, for the purpose of a non-project DEIS, to conduct detailed studies prior to the project development stage.
- 12) The DEIS does not advocate for any alternative or combination of alternatives examined.
- 13) See response 2 above and:

Section 2.3.2. "All seven alternatives will increase discharges to the air from vehicular and construction related sources. Motor vehicles will likely have the most significant long-term effect, as suspended particulates, ozone, and carbon monoxide content will increase as automobile traffic increases."

- 14) The DEIS does not attempt to, nor is it required to, put forward every possible impact or mitigation measure, nor does it guarantee that the mitigation measures that are presented will be implemented. Detailed analysis of impacts and implementation of mitigation measures will take place upon application of specific projects so appropriate actions can be taken at that time.

The DEIS broadly examines the impacts of a range of strategies for accommodating projected growth. WAC 197-11-442 states that non-project DEISs "shall be limited to a general discussion of impacts...and implementation measures. The lead agency is not required under SEPA to examine all conceivable policies, designations, or implementation measures but should cover a range of such topics".

This is a Non-project DEIS, and the concerns of the writer cannot be addressed until and if specific project applications are received. Further environmental review will occur at that time.

The DEIS does not advocate for any alternative or combination of alternatives examined.

- 15) It is stated in the impact to each alternative that there will be significant impacts to surface, groundwater, and wetlands.

The DEIS does not attempt to, nor is it required to, put forward every possible impact or mitigation measure, nor does it guarantee that the mitigation measures that are presented will be implemented. Detailed analysis of impacts and implementation of mitigation measures will take place upon application of specific projects so appropriate actions can be taken at that time.

The DEIS broadly examines the impacts of a range of strategies for accommodating projected growth. WAC 197-11-442 states that non-project DEISs "shall be limited to a general discussion of impacts...and implementation measures. The lead agency is not required under SEPA to examine all conceivable policies, designations, or implementation measures but should cover a range of such topics".

This is a Non-project DEIS, and the concerns of the writer cannot be addressed until and if specific project applications are received. Further environmental review will occur at that time.

Section 2.4 Water Resources. Make the following correction on page 2-24 of the DEIS, Land Use: Replace "There are no priority habitats or species in the planning area" with "The stretch of the Spokane River in the NW planning area has been designated Urban Natural Open Space. Urban Natural Open Space is defined as "A priority species resides within or is adjacent to the open space and uses it for breeding and/or regular feeding; and/or the open space functions as a corridor connecting other *priority habitats*, especially those that would otherwise be isolated; and/or the open space is an isolated remnant of natural habitat larger than 4 ha (10 acres) and is surrounded by urban development. Local considerations may be given to open space areas smaller than 4 ha (10 acres)." (Definition provided on <http://wdfw.wa.gov/hab/phshabs.htm>)".

Section 2.5.1.1.6. Riparian Areas. Add to text: "The stretch of the Spokane River in the NW planning area has been designated Urban Natural Open Space. Urban Natural Open Space is defined as "A priority species resides within or is adjacent to the open space and uses it for breeding and/or regular feeding; and/or the open space functions as a corridor connecting other *priority habitats*, especially those that would otherwise be isolated; and/or the open space is an isolated remnant of natural habitat larger than 4 ha (10 acres) and is surrounded by urban development. Local considerations may be given to open space areas smaller than 4 ha (10 acres)." (Definition provided on <http://wdfw.wa.gov/hab/phshabs.htm>)".

Section 2.5.1.3.1. Priority Habitats. Make the following correction on page 2-36 of the DEIS: Replace "There are no priority habitats or species in the NW planning area" with "The stretch of the Spokane River in the NW planning area has been designated Urban Natural Open Space. Urban Natural Open Space is defined as "A priority species resides within or is adjacent to the open space and uses it for breeding and/or regular feeding; and/or the open space functions as a corridor connecting other *priority habitats*, especially those that would otherwise be isolated; and/or the open space is an isolated remnant of natural habitat larger than 4 ha (10 acres) and is surrounded by urban development. Local considerations may be given to open space areas smaller than 4 ha (10 acres)." (Definition provided on <http://wdfw.wa.gov/hab/phshabs.htm>)".

- 16) Map 2.9 is accurate in it's depiction of designated species and priority habitats located in and around the planning areas

The DEIS does not attempt to, nor is it required to, put forward every possible impact or mitigation measure, nor does it guarantee that the mitigation measures that are presented will be implemented. Detailed analysis of impacts and implementation of mitigation measures will take place upon application of specific projects so appropriate actions can be taken at that time.

- 17) Not a comment on the adequacy of the DEIS, but rather an expression of concern for various issues and a preference for a particular planning outcome.



**Amanda Tainio**

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**From:** Doug Smith [dsmith@libertylakewa.gov]  
**Sent:** Thursday, December 07, 2006 8:05 AM  
**To:** Mary Wren  
**Cc:** Amanda Tainio  
**Subject:** FW: Comments to the EIS

-----Original Message-----

**From:** Dave Paperd [mailto:dppaperd@mac.com]  
**Sent:** Wednesday, December 06, 2006 4:39 PM  
**To:** Doug Smith  
**Subject:** Re: Comments to the EIS

Warm regards to you too. I know its a lot of hard and sometimes thankless work.

Dave. P

On Dec 6, 2006, at 7:53 AM, Doug Smith wrote:

Good morning Dave,  
I appreciate you taking the time to share your thoughts.  
Have a great day, Doug

-----Original Message-----

**From:** Dave Paperd [mailto:dppaperd@mac.com]  
**Sent:** Tuesday, December 05, 2006 7:16 PM  
**To:** dsmith@libertylakewa.gov; spiritdoc@ccser.com; debbied@liblake.com; Tom Hyslop; bruceandre@bruceandre.com  
**Subject:** Comments to the EIS

I have real estate experience in many of the major cities on the West coast, including San Diego, Seattle, Los Angeles, and Anchorage over the last 30 years. I have read the documents pertaining to Urban growth. My understanding is that there is a state mandate to plan growth and to focus growth within boundaries established through a long range planning process to increase density in those areas that are currently served by infrastructure including Water, sewer, power, Fire, schools, and police protection.

In every community including Liberty Lake, Spokane and the Spokane valley you will find plenty of undeveloped lots and raw land which have no residential currently developed on them and with infrastructure available. For that matter you will find plenty of commercial property in every major corridor as well. When I look at a map of the City of Liberty Lake I see enough undeveloped land within currently established urban growth boundaries to convince me that there will be housing and commercial supplied for 20 more years. This is so particularly based on the growth that I have witnessed in 10 years as a resident here.

I am herein urging the planning body to focus its efforts on intelligent growth **within those boundaries**, and as necessary, annexing new land to the north and

east where there is currently no housing. There is plenty of room for mixed value residential including low end, with high end along the river front without taking off more than the city can provide for. My opinion is that city's current planning efforts are so far afield of the intent of urban growth mandates as to position themselves at odds with the law.

We will not need the land currently being considered for perhaps 20 years. I am deeply concerned that effort needs be devoted to intelligent considerations of traffic handling. Traffic is a plague in every major urban area and ultimately a big reason that people want to move to obtain a better quality of life. IT is not necessary to rush into growth for its sake, like every other city has done. It will come. Lets do it right.

Please spend your time planning for growth in those areas that are down on the flat of the land and within the boundaries as required by the law of the land. I strongly object to the current course that you are following. I also do not agree that it is necessary to expand the city boundaries to handle growth when Spokane Valley, Otis Orchards, Newman Lake, and Liberty Lake have capacity aplenty for everyone who might arrive here.

*310 S. Green Ridge Rd.*

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**Response to Dave Paperd:**

**Not a comment on the adequacy of the DEIS, but rather an expression of concern for various issues and a preference for a particular planning outcome.**